REMARKS

Initially, Applicant would like to thank the Examiner for the courtesies extended during the telephonic interview conducted on Tuesday, March 2, 2004. During the interview and subsequent telephone conversation, the Examiner informed Applicant's representative that the proposed claim amendments, included herein, which more clearly distinguish the "text" content from the "help" content, would likely overcome the rejections of record.

Upon entry of this Amendment, claims 1 and 3-32 are all the claims pending in the application. Claim 2 has been canceled. Claims 30-32 have been added. Claims 1-29 presently stand rejected.

Claims 1 and 2 are rejected under 35 U.S.C. § 102(e) as being anticipated by Dozier et al. (USP 5,870,553); and claims 3-9 and 11-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dozier et al. in view of Pepe et al. (USP 5,742,905). For the reasons set forth below, Applicant respectfully traverses the rejections and requests favorable disposition of the application.

Argument

Claim 1

Claim 1 has been amended in accordance with the Examiner's suggestion to more clearly distinguish "text" content from "help" content. Specifically, Applicant has added the language, "wherein the processed help content automatically controls various functions said portable terminal to enable a user of said portable terminal to more easily utilize the text content." Applicant submits that claim 1 clearly distinguishes over the cited prior art.

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In regard to the present claim rejections, the Examiner asserts that the "anchor items" disclosed by Dozier et al within column 14, lines 24-42 are the same as the claimed "help contents". In response, Applicant respectfully submits that the anchor items of Dozier et al. are completely different than the claimed help contents. Specifically, "[a]n 'anchor' item is an item of content within a source document encoded as a hypermedia link; users 'click' on anchor items to bring up linked target documents." (Col. 14, lines 30-33). A facility known as "NaviLinks" opens a window on the user's display and several potential links, or targets, are displayed that will connect the user to additional information when the hyperlink is 'clicked'. A list of suggested anchor items and potential targets, i.e., links, "are generated automatically, preferably using statistical language processing techniques such as provided in the Xerox Lexical Technology ("XLT") package commercially available from the Xerox Corporation." (Col. 14, lines 39-42). Accordingly, the anchor items of Dozier et al. are for directing a user to additional text content available for certain identified items within a hypermedia document. The anchor items are clearly not the same as "help content [which] includes specific information regarding how to retrieve or use the text content", as claimed. For at least this reason, Dozier et al. does not teach or otherwise disclose the recited help contents on claim 1 and the rejection of claim 1 over Dozier et al. under 35 U.S.C. §102 should be withdrawn.

Furthermore, Dozier et al. does not disclose a "help browser operable to process the help content stored in said server". The passage cited by the Examiner in Dozier et al., column 14, lines 29-53, discloses nothing regarding a browser for processing *help content*, as discussed above. The window that is automatically opened in Dozier et al., i.e., window 124 of Fig. 8a,

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shows a list of potential anchor items, e.g., list 126, and a corresponding suggested link list, e.g., list 128. The links can then be automatically encoded directly onto the anchor item in the source document. (Col. 14, lines 43-53).

The feature of being able to automatically add encoded links that automatically connect a user/reader of the hypermedia document is not the same as having a separate help browser that reads help content data that assists the user by showing the user "a method of utilizing the text content," for example by disabling certain keys on the portable terminal and lighting or vibrating certain other, enabled, keys used to provide input to the portable terminal. For this additional reason, Dozier et al. does not anticipate claim 1 under 35 U.S.C. §102 and the rejection of claim 1 should be withdrawn.

Claims 2-9

For at least the same reasons as those set forth above in regard to claim 1, and because Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 2-9, which depend from claim 1, also define subject matter that is patentable over the cited prior art.

Claim 10

For similar reasons as those set forth above in regard to claim 1, Dozier et al. does not teach or disclose at least the help browser recited in claim 10. Accordingly, Dozier et al. does not anticipate claim 10 and the rejection thereto should be withdrawn.

Claims 11-17

For at least the same reasons as those set forth above in regard to claim 10, and because Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 11-17, which depend from claim 10, also define subject matter that is patentable over the cited prior art.

Claims 18-19

For similar reasons as those set forth above in regard to claim 1, Dozier et al. does not teach or disclose at least the help browser recited in claim 18. Additionally, Dozier et al. does not teach or suggest activating either a text browser or a help browser based on the result of a judging step, as explicitly recited in claim 18. Pepe et al. does not teach this recited feature either. For at least these reasons, the combination of Dozier et al. and Pepe et al. does not disclose the recited subject matter of claim 18 and the rejection thereto should be withdrawn.

For at least the same reasons as those set forth above in regard to claim 18, claim 19, which depends from claim 18, also defines subject matter that is patentable over the cited prior art. Furthermore, neither of the cited references teach or disclose outputting help contents as text, voice, static images moving images, or any combination of these formats, as explicitly recited in claim 19. Accordingly, for this additional reason, the rejection of claim 19 should be withdrawn.

Claims 20-21

For at least the same reasons as those set forth above in regard to claim 10, i.e., with respect to the help browser and help message, claim 20 defines subject matter that is patentable over the cited prior art. Additionally, however, neither Dozier et al. nor Pepe et al. teach or

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suggest *judging* whether an inputted message is a text message or a help message, or *activating* either a text browser or a help browser based on the result of the judgment. For this additional reason, claims 20-21 are patentable over the combination of Dozier et al. And Pepe et al. and the rejection should be withdrawn.

Claim 22

For at least similar reasons as those set forth above in regard to claim 10, i.e., with respect to the help browser and help message, claim 22 defines subject matter that is patentable over the cited prior art.

Additionally, Dozier et al. does not teach or suggest, an ***information source server*** that can separately store both target content as well as help content, *wherein the help content is ancillary to the target content and is provided to assist in retrieval of the target content,* as required by claim 22.

Dozier et al. also does not teach or suggest either a ***wireless device***, as claimed in claim 22, or a ***radio gateway server*** *connected to both a wireline and wireless network.*

For all of the above reasons, Dozier et al. does not anticipate claim 22 and the rejection of claim 22 should be withdrawn.

Claims 23-26

For at least the same reasons as those set forth above in regard to claim 22, and because Pepe et al. does not compensate for the deficiencies of Dozier et al., claims 23-26, which depend from claim 22, also define subject matter that is patentable over the cited prior art and the rejection of claims 23-26 should be withdrawn.

Claim 27

For at least similar reasons as those set forth above in regard to claim 10, i.e., with respect to the help browser and help data, claim 27 defines subject matter that is patentable over the cited prior art.

Additionally, neither Dozier et al. nor Pepe et al. teach or suggest a help display processor operable to display help data that is *exclusively for assisting in retrieval of the target data*. For this additional reason, claim 27 defines subject matter patentable over the proposed combination of Dozier et al. and Pepe et al. and the rejection of claim 27 should, accordingly, be withdrawn.

Claims 28-29

For at least the same reasons as those set forth above in regard to claim 27, claims 28-29, which depend from claim 27, also define subject matter that is patentable over the cited prior art and the rejection of claims 28-29 should be withdrawn.

Conclusion

In view of the foregoing remarks, the application is believed to be in form for immediate allowance with claims 1 and 3-32, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to **contact the undersigned** at the telephone number listed below.

AMENDMENT UNDER 37 C.F.R. § 1.111
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The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

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Respectfully submitted,

[signature]

SUGHRUE MION, PLLC   Kevin M. Barner
Telephone: (202) 293-7060   Registration No. 46,075
Facsimile: (202) 293-7860

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